

**ASK LLP**

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*Counsel for EzraSons, Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,  
Debtors.

Case No. 18-23538 (RDD)

Chapter 11

Jointly Administered

**NOTICE OF RECLAMATION DEMAND OF EZRASONS, INC.**

EzraSons, Inc., by and through its undersigned counsel, hereby gives notice that it served a demand for reclamation of goods (the “Reclamation Demand”) pursuant to section 546(c) of the Bankruptcy Code on November 5, 2018. A copy of the Reclamation Demand is attached as Exhibit A.

Dated: November 5, 2018

**ASK LLP**

/s/ Edward E. Neiger

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*Counsel for EzraSons, Inc.*

# EXHIBIT A



ATTORNEYS AT LAW

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November 5, 2018

**Via Overnight Mail and Email**

Ray C. Schrock, Esq.  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

**Via Overnight Mail**

Robert A. Reicker  
Chief Financial Officer  
Sears Holdings Corp.  
3333 Beverly Road  
Hoffman Estates, IL 60179

**Re: *Sears Holdings Corp., et al.* (collectively, the “Debtors”)  
Case No. 18-23538 (RDD)**

Dear Sirs:

We are counsel to EzraSons, Inc. (“Creditor”) in connection with the above matter. In accordance with section 546(c) of title 11 of the United States Code (the “Bankruptcy Code”) and section 2-702 of the Uniform Commercial Code, Creditor hereby makes demand for reclamation of goods (the “Goods”) received by the Debtors from Creditor within forty-five (45) days prior to the petition date (the “Petition Date”) in the Debtors’ bankruptcy cases at a time when the Debtors were insolvent, and which Goods are currently in the Debtors’ possession. Accordingly, this would cover goods received by the Debtors on or after August 31, 2018. Attached hereto as Schedule I is documentation describing or identifying the particular Goods for which Creditor asserts its reclamation demand. Creditor reserves the right to modify the scope of the Goods subject to its reclamation demand, following further investigation and subject to applicable law.

This reclamation demand is made without prejudice to Creditor’s right to assert administrative claims under section 503(b)(9) of the Bankruptcy Code with respect to any portion of the Goods that were received by the Debtors within twenty (20) days before the Petition Date. You are further notified that all goods subject to Creditor’s reclamation rights should be protected and segregated, and are not to be used for any purpose whatsoever except by agreement of the parties or following notice and a hearing by a court of competent jurisdiction. We appreciate your cooperation in this matter. All rights are reserved.

ask<sup>llc</sup> | ATTORNEYS AT LAW

November 5, 2018

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Very truly yours,

*/s/ Edward E. Neiger*

Edward E. Neiger

# **SCHEDULE I**

PURCHASE ORDER NUMBER	INVOICE#	INVOICE DATE	INVOICE VALUE	DATE DELIVERED	LOCATION FOR GOODS
8780036393	32473	9/12/2018	\$4,655.20	9/11/2018	3100 MIKKIKEN AVE MIRA LOMA CA 91752
8781010406	32474	9/12/2018	\$3,647.60	9/11/2018	1475 NITTERHOUSE DRIVECHAMBERSBURG PA 17201
8781010540	32475	9/12/2018	\$594.00	9/11/2018	
8780037294	32480	9/13/2018	\$5.40	9/14/2018	3100 MIKKIKEN AVE MIRA LOMA CA 91752

\$8,902.20